

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY III LLC, <i>et al</i>, Post-Effective Date Debtors.¹ -----	§ § § § § § § §	Chapter 11 Case No. 20-33948(MI) (Jointly Administered)
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**DECLARATION OF ERIN M. CHOI IN SUPPORT OF
QUARTERNORTH ENERGY LLC’S STATEMENT IN SUPPORT OF
BANKRUPTCY RULE 2004 REQUESTS FOR PRODUCTION OF DOCUMENTS
FROM BP EXPLORATION & PRODUCTION, INC. AND SHELL OFFSHORE INC.**

I, Erin M. Choi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am counsel at the firm Weil, Gotshal & Manges LLP (“**Weil**”), which maintains an office for the practice of law at 700 Louisiana Street, Suite 1700, Houston, Texas 77002. I am an attorney at law, duly admitted and in good standing to practice in the State of Texas and am admitted to practice before the U.S. District Courts for the Northern, Southern, and Eastern Districts of Texas. I have made an appearance in the above-captioned chapter 11 cases to represent QuarterNorth Energy LLC (“**QuarterNorth**”).

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “**Post-Effective Date FWE I Subsidiaries**”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. I submit this declaration in support of *QuarterNorth Energy LLC's Statement in Support of Bankruptcy Rule 2004 Requests for Production of Documents from BP Exploration & Production, Inc. and Shell Offshore Inc.* (the "**Statement**"), filed concurrently herewith in the above-captioned proceedings.

3. Attached as Exhibit 1 is a true and correct copy of an email from K. Gurses (BP) to N. Vaughn (Fieldwood) dated February 26, 2020.

4. Attached as Exhibit 2 is a true and correct copy of an email from J. Oliveira (BP) to M. Dane (Fieldwood) dated March 12, 2020.

5. Attached as Exhibit 3 is a true and correct copy of an email from S. Sykes (BP) to M. McCarroll (Fieldwood) dated May 3, 2019.

6. Attached as Exhibit 4 is a true and correct copy of a slide deck BP presented to Fieldwood on January 14, 2021, which BP previously filed publically with the Court at ECF No. 985-9.

7. Attached as Exhibit 5 is a true and correct copy of an email from J. Janik (BP) to N. Vaughn (Fieldwood) sent on May 17, 2019 at 3:53 p.m. Central Time and the email's attachment, three Authorizations for Expenditure each dated May 1, 2019.

8. Attached as Exhibit 6 is a true and correct copy of an email from J. Janik (BP) to N. Vaughn (Fieldwood) dated June 11, 2020 and the email's attachment, an Authorization for Expenditure dated January 28, 2020.

9. Exhibits 1, 2, 3, 5, and 6 are filed under seal consistent with the *Motion for Entry of an Order Authorizing QuarterNorth Energy LLC to File Confidential Documents Under Seal* (filed contemporaneously herewith).

10. I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: June 10, 2022
Houston, Texas

/s/ Erin M. Choi

Erin M. Choi

Certificate of Service

I hereby certify that on June 10, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Paul R. Genender

Paul R. Genender